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MAR 15 2021

CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

May, Randall J

vs.

Plaintiff(s),

Delta Air Lines

Case No. 21-CV-710 ADM/ECW
(To be assigned by Clerk of District Court)

DEMAND FOR JURY

TRIAL

YES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL plaintiffs
and defendants in this lawsuit. Please
attach additional sheets if necessary.)

EMPLOYMENT DISCRIMINATION COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name Randall Joseph May
Street Address 6816 83rd Ave North
County, City Hennepin, Brooklyn Park
State & Zip Code MN 55445
Telephone Number (763) 316-7946

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address

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U.S. DISTRICT COURT ST. PAUL

where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name Delta Air Lines / Attorney Andrea Bowman
Street Address 1030 Delta Blvd., Dept. 981
County, City Fulton, Atlanta
State & Zip Code GA 30320

b. Defendant No. 2

Name _____
Street Address _____
County, City _____
State & Zip Code _____

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.c., 2.d., etc.)

JURISDICTION

The Court has jurisdiction over this action under 28 U.S.C. § 1331.

3. This employment discrimination lawsuit is based on (check only those that apply):

- a. ☐ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et. seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin. **NOTE:** *In order to bring suit in federal district court under Title VII, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission (EEOC).*
- b. ☐ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et. seq.*, for employment discrimination on the basis of age (age 40 or older). **NOTE:** *In*

order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission (EEOC).

- c. ☒ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et. seq.*, for employment discrimination on the basis of disability. **NOTE:** *In order to bring suit in federal court under the Americans with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission (EEOC).*
- d. ☐ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et. seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance. **NOTE:** *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office (EEO) representative or agency.*
- e. ☐ Other (Please describe.)

4. If you are claiming that the discriminatory conduct occurred at a location other than the defendant's address above, please provide the following information on where the conduct occurred:

4300 Glumack Drive St. Paul / Ramsey MN 55111
(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

July 2nd, 2018

ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

a. ☒ Yes Date filed: 10 / 04 / 2018

b. ☐ No

7. Have you received a Notice of Right-to-Sue Letter?

- a. ☒ Yes If yes, please attach a copy of the letter to this complaint.
- b. ☐ No

NATURE OF THE CASE

8. The conduct complained of in this law suit involves (check only those that apply):

- a. ☐ Failure to hire me
- b. ☐ Termination of my employment
- c. ☐ Failure to promote me
- d. ☒ Failure to accommodate my disability
- e. ☐ Terms and conditions of employment differ from those of similar employees
- f. ☐ Retaliation
- g. ☒ Harassment
- h. ☐ Other conduct (please specify): _____

i. Did you complain about this same conduct in the charge of discrimination, referred to in number 6 above?

☒ Yes ☐ No

9. I believe that I was discriminated against because of my (check all that apply):

- a. ☐ Race
- b. ☐ Religion

- c. ☐ National origin
- d. ☐ Color
- e. ☐ Gender
- f. ☒ Disability
- g. ☐ Age (my birth year is: _____)
- h. ☐ Other (please specify): _____
- _____
- _____
- _____

- i. Did you state the same reason(s) in the charge of discrimination, referred to in number 6 above?

☒ Yes ☐ No

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct (i.e. how, where, and when). Each paragraph must be numbered separately, beginning with number 10. Please write each allegation of discrimination in a separately numbered paragraph.

10. (10.1) I provided medical documentation and requested the Reasonable Accommodation of schedule modification for my Disability and was denied/refused accommodation on 7/2/2018

(10.2) After providing Delta Air Lines access to my mental health medical records, I was accused of making a terroristic type threat on 7/2/2018. I was interrogated and harassed

by Delta's Corporate Security Officer Anthony Spencer. He stated "You need to have your meds checked."

(10.3) On July 2nd, 2018 I was stripped of all of my credentials including: S.I.D.A. badge, employee I.D. and parking permit and was escorted/forced off property.

(10.4) After filing a Charge of Discrimination with the EEOC, on 10/4/2018, I was sent a fraudulently backdated letter on 10/9/2018 by Delta Air Lines. This letter was dated 7/30/2018.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I want the Court to hold Delta Air Lines responsible for the Disability Discrimination they subjected me to in the year 2018. I am seeking damages

totaling to the amount of \$ 2,600,000.⁰⁰

Date: 3/15/2021

Randy May
Signature of Plaintiff

Mailing Address 6816 83rd Ave N.
Brooklyn Park, MN 55445

Telephone Number (763) 316-7946

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.